

REMARKS

Reconsideration of this application is respectfully requested. No claim amendments have been made herein.

1. **Claims 1-2, 6-9, 11-12, and 16-20 are not anticipated by Freeman (US patent No. 6,373,890), hereinafter "Freeman", under 35 U.S.C. § 102(b)**

Claim 1 refers to a method that includes "encoding data values described by one or more multi-dimensional parameters, each of the multi-dimensional parameters having multiple constituent sub-parameters of more than one value, by mapping the multiple constituent sub-parameters of each of the multi-dimensional parameters of the data values to respective one-dimensional parameters having a single one of the sub-parameters by which the multi-dimensional parameters will now be represented." An example is provided in Applicant's specification on page 9, where it is explained that a pixel, with multiple color components (e.g., sub-parameters, such as Red, Green and Blue) may be represented by only one of those sub-parameters (e.g., Red).

The Office Action of February 20, 2008 alleges that "mapping the multiple constituent sub-parameters of each of the multi-dimensional parameters of the data values to respective one-dimensional parameters having a single one of the sub-parameters by which the multi-dimensional parameters will now be represented", as required by Claim 1, is taught by column 3, lines 21-30 of Freeman. Column 3, lines 21-30 of Freeman reads,

The minimum number of colors necessary for the block can be calculated by sorting the determined colors present in the block by frequency of occurrence of each color; comparing each of the determined colors to each other determined color; ascertaining comparatively close colors from the comparison of each determined color in accordance with the color threshold; and substituting the more frequently occurring color for the less frequently occurring color of two comparatively close colors. (emphasis added)

Freeman teaches the substitution of one color for another color, or in other words, teaches the substitution of one data value for another data value. This teaches something very different from "mapping the multiple constituent sub-parameters of each of the multi-dimensional parameters of the data values to respective one-dimensional parameters having a single one of the sub-parameters by which the multi-dimensional parameters will now be represented" as required by Claim 1. Freeman teaches that

Specifically, three bytes will be required to identify each color: a red COLOR byte having 8 bits will represent the color red (R), a green COLOR byte having 8 bits will represent the color green (G), and a blue COLOR byte having 8 bits will represent the color blue (B). (Freeman, 5:40-44)

and

... each color value to be stored has an R, G and B component value (Freeman, 5:47-48)

When one color represented by three bytes is substituted for another color, the resulting color also has three bytes, as Freeman teaches “each color value to be stored has an R, G and B component value”, and from column 5, lines 40-44, each color is represented by one byte. In the compression of color video data of Freeman, there is no reduction in the dimension of data values, as substituted data values have the same number of dimensions as the original data values, namely three, one for each of the color components R, G, and B. Thus, Freeman fails to teach or suggest “mapping the multiple constituent sub-parameters of each of the multi-dimensional parameters of the data values to respective one-dimensional parameters having a single one of the sub-parameters by which the multi-dimensional parameters will now be represented” as required by Claim 1, and hence, Claim 1 is patentable over Freeman.

As Claims 11 and 20 include similar limitations to the limitation of Claim 1 described above, for the same reasons that Claim 1 is not anticipated by Freeman, Claims 11 and 20 are not anticipated by Freeman. Furthermore, as Claims 2 and 6-9 depend from Claim 1, and Claims 12 and 16-19 depend from Claim 11, Claims 2, 6-9, 12, and 16-19 are not anticipated by Freeman.

2. Claims 3 and 13 are not unpatentable over Freeman, in further view of Lim (US patent No. 5,339,164), hereinafter "Lim", under 35 U.S.C. §103(a)

Claims 3 and 13 depend from Claims 1 and 11 respectively. For the reasons stated above, independent Claims 1 and 11 are patentable over Freeman. Lim was relied on by the Office Action for teaching data values comprising position information. However, Lim fails to cure the deficiencies of Freeman, as Lim does not disclose or suggest “mapping the multiple constituent sub-parameters of each of the multi-dimensional parameters of the data values to respective one-dimensional parameters having a single one of the sub-parameters by which the multi-dimensional parameters will now be represented”. Therefore, when considered singularly or in combination, the references cited by the Office Action do not disclose or suggest every

limitation of Claims 3 and 13. Consequently, Claims 3 and 13 are not obvious in view of the combination of references.

3. Claims 4-5, 10, and 14-15 are not unpatentable over Freeman under 35 U.S.C. § 103(a)

Claims 4-5 and 10 depend from Claim 1, and Claims 14-15 depend from Claim 11. For the reasons stated above, independent Claims 1 and 11 are patentable over Freeman. Claims 4-5, 10, and 14-15 should be patentable by virtue of their dependency from independent Claims 1 and 11.

For at least the foregoing reasons, the claims are patentable over the references cited in the Office Action. If there are any additional fees due in connection with this communication, including fees for any extensions of time, please charge Deposit Account No. 19-3140.

Respectfully submitted,
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